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November 8, 2000

Mr. Richard Boyles
Utilities Engineer - Telecommunications
Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

DOCKET NO. T-000000-99-0641

Re: Request for Additional 520 NPA Relief Alternative Analysis


Dear Mr. Boyles:

In response to your request that NANPA analyze an additional relief alternative developed by the ACC, the result of that analysis is described below. Also, a map of this alternative is attached for your review and information.

As you know, the alternative you developed (titled "Alternative ACC") modifies Alternative 2A by removing the Miami, Globe and San Carlos rate areas in Gila County from the area that would retain the 520 NPA. In addition, the 520 NPA as represented in Alternative 2A would be expanded to include the remaining rate areas in Pima County and all rate areas in Cochise County.

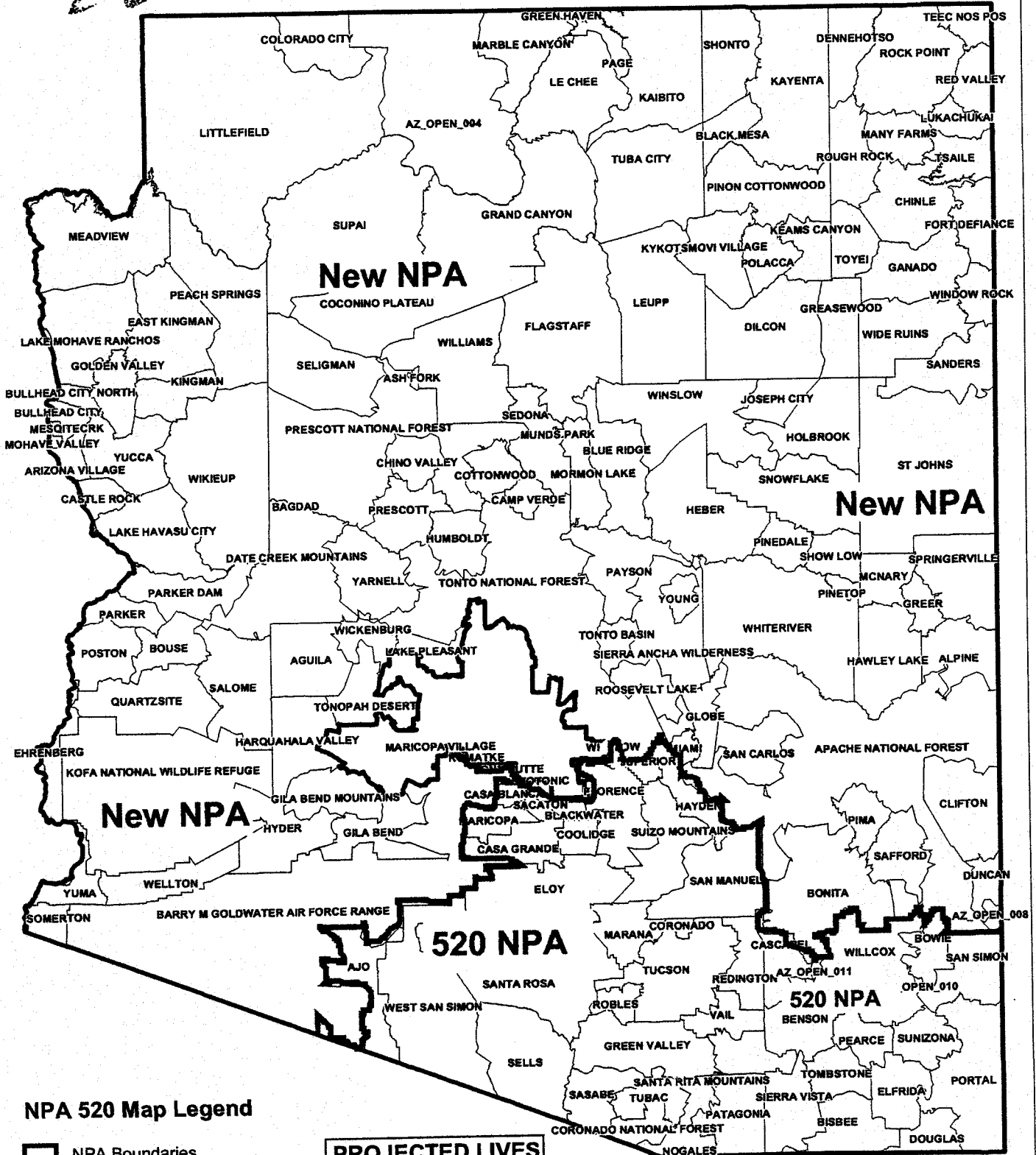
The projected lives of the 520 area code and the new relief area code are as follows: the 520 NPA has a projected life (based on information currently available to NANPA) of 11 years before additional relief would be required; and the new area code has a projected life of 14 years before additional relief would be required. This alternative does meet industry guidelines for assignment of a relief NPA, in the event it is the alternative ordered by the Commission.

If you have any questions, please feel to call me at (562) 436-6524.


Dan H. Burcham
NPA Relief Planner - Western Region
NeuStar NANPA

Attachment

NEUSTAR, INC.
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NPA 520 Map Legend

- NPA Boundaries
- Rate Center Boundaries

PROJECTED LIVES

520 NPA 11 Years

New NPA 14 Years